

From: Fleeger, Dick [mailto:Dick.Fleeger@Sonneborn.com]

Sent: Tuesday, December 02, 2014 3:13 PM

To: 'Balog, David' <dbalog@pa.gov>; Blanco-Gonzalez, Joel <Blanco-Gonzalez.Joel@epa.gov>; Pesek, Adam <apesek@pa.gov>

Cc: Holloway, John <John.Holloway@Sonneborn.com>

Subject: RE: EXTERNAL:::RE: Draft Permit Comments - Sonneborn, Inc. - PA0002666

Good afternoon Dave

Sonneborn has reviewed the Final Draft of the NPDES permit and does not have any comments .

Richard Fleeger

Env. Mgr.

From: Balog, David [<mailto:dbalog@pa.gov>]

Sent: Tuesday, November 25, 2014 3:53 PM

To: Blanco-Gonzalez, Joel; Pesek, Adam

Cc: Fleeger, Dick

Subject: EXTERNAL:::RE: Draft Permit Comments - Sonneborn, Inc. - PA0002666

Joel/Dick Fleeger:

Attached is DEP's response to EPA's comments, and a proposed final NPDES permit. Adam requested I send these on his behalf. The only permit changes really involve Outfall 010; addition of concentration limits for iron and aluminum, and clarified the TDS & chloride monitoring frequencies are in fact quarterly.

DEP is supposed to issue this permit by Friday Dec 5. Please inform us of any final concerns so we can move to final issuance. Thanks & Happy Turkey Day, Dave

David G. Balog, P.E. | Environmental Engineer Manager, Permits Section
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From: Blanco-Gonzalez, Joel [<mailto:Blanco-Gonzalez.Joel@epa.gov>]
Sent: Monday, November 10, 2014 4:35 PM
To: Pesek, Adam
Cc: Trulear, Brian; Cruz, Francisco; Balog, David
Subject: Draft Permit Comments - Sonneborn, Inc. - PA0002666

Adam,

According to the Memorandum of Agreement between the U.S. Environmental Protection Agency (EPA) Region III and the Pennsylvania Department of Environmental Protection (DEP), the EPA has reviewed the draft National Pollutant Discharge Elimination System (NPDES) permit for:

Draft Permit: Sonneborn, Inc.
Also Known As: Sonneborn
NPDES ID: PA0002666
EPA Received: October 11, 2014

EPA has chosen to perform a limited review based on the Clean Water Act (CWA) § 316(a) and the Total Maximum Daily Load (TMDL) for South Branch Bear Creek requirements. As a result of our limited review we offer the following comments.

1. The TMDL assigns waste load allocations (WLAs) for iron (1.3 mg/L and 5.2 lb/day), manganese (1 mg/L and 4 lb/day), and aluminum (0.58 mg/L and 2.3 lb/day). The draft permit as written includes the concentration and load for manganese. Please include the concentration and load for iron and aluminum following the short and long term requirements.
2. Before a thermal variance can be granted, 40 CFR §§ 125.72 and 125.73 require the permittee to demonstrate that the otherwise applicable thermal discharge effluent limit is more stringent than necessary to assure the protection and propagation of the waterbody's balanced indigenous population (BIP) of shellfish, fish and wildlife. With respect, but not limited to, the renewal of a prior CWA § 316(a) thermal variance, it is essential that PADEP requires applicants to provide as much of the information described in 40 CFR § 125.72(a) and (b) as necessary to demonstrate that the alternative effluent limit assures the protection and propagation of the BIP. Parts C.I.E. explains that the temperature limitations in this draft permit represent the DEP's approval for the renewal of the thermal variance. The fact sheet as written does not include as much information as necessary to demonstrate the protection and propagation of the BIP. Did DEP use additional information to grant the renewal of the thermal variance. If so, please submit this information to us for our review and comments.

Please address our comments and recommendations, and provide us with any changes to the draft permit and/or fact sheet.

If you have any questions concerning this matter, please contact us.

Respectfully,

Joel

Joel Blanco-González
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